

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JUUL LABS, INC.,

Plaintiff,

v.

Civil Action No. 1:19-cv-00715-LO-IDD

**THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,**

Defendants.

[PROPOSED] ORDER FOR ENTRY OF DEFAULT JUDGMENT

Upon consideration of Plaintiff's Motion for Entry of Default Judgment and Memorandum in Support of the Motion, it is hereby:

ORDERED that the Motion shall be, and hereby is, granted; and it is further

ORDERED that the Defendants are hereby permanently enjoined from making, using, selling, or offering for sale unauthorized products containing Plaintiff's trademarks;

ORDERED that a monetary judgment of \$4,000,000 is entered separately against each of the Defendants for infringing Plaintiff's marks;

ORDERED that PayPal, Inc. shall release to Plaintiff the monies currently restrained in the Defaulting Defendants' financial accounts as partial payment of the above-identified damages within five (5) business days of receipt of this Order; and

FURTHER ORDERED that, until Plaintiffs have recovered full payments of monies owed to it by any Defaulting Defendant, Plaintiffs shall have an ongoing authority to serve this Order on PayPal in the event that any new PayPal accounts controlled or operated by the

Defaulting Defendants are identified. Upon receipt of the Order, PayPal shall, within two (2) business days:

- a. Locate all accounts and funds connected to the Defaulting Defendants or the Defaulting Defendants Internet Stores, including those listed in the memorandum of law in support of Plaintiff's Motion;
- b. Restrain and enjoin such accounts or funds that are not U.S. based from transferring or disposing of any money or other of the Defaulting Defendants' assets; and
- c. Release all monies restrained in the Defaulting Defendants' PayPal accounts to Plaintiffs as partial payment of the above-identified damages within ten (10) business days of receipt of this Order.

SO ORDERED THIS ____ day of _____, 20__.

United States Magistrate Judge